

# LAW OFFICE OF RUDY A. DERMESROPIAN, LLC

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December 11, 2020

**Via ECF**

Hon. Valerie Caproni, U.S.D.J.  
United States District Court, SDNY  
40 Foley Square, Room 240  
New York, NY 10007

**Re: *Sophie Beckerman v. Fresh Digital Group, Inc., Doug Robinson, et al.***  
**Case No. 20-cv-1530 (VEC)**

Dear Judge Caproni,

This office represents the Plaintiff, Sophie Beckerman (“Ms. Beckerman”), in the above-referenced matter. We respectfully submit this letter in compliance with the Order entered on November 19, 2020 [see Docket No. 27], whereby the Court ordered that, “by no later than Friday, December 11, 2020, Plaintiff must either provide sufficient facts about existing clients, contracts, or other revenue sources from which the Court can infer that Fresh Digital had annual revenue in excess of \$500,000 in 2018 or voluntarily dismiss the action so that it can be refiled in state court.”

With regard to Defendant Fresh Digital Group, Inc.’s (the “Company”) list of clients, Plaintiff states that prior to 2018, the Company’s clients included, but may not have been limited to, the companies listed in the attached document, which is part of the Company’s Investor Presentation submitted to the Court on November 13, 2020 [see Docket No. 25-2]. However, Plaintiff is not in possession of a more current list of clients and is therefore unable to provide that information to the Court at this time.

In addition, because Plaintiff was not privy to information pertaining to the Company’s finances or income, she is unable to identify the sources of revenue that Defendants had. However, as previously stated, Plaintiff believes that the revenue should have been over \$500,000 in 2018 as shown on the Investor Presentation projections prepared by Defendants.

We thank the Court for its time and consideration of this matter.

Respectfully submitted,  
*/s/ Rudy A. Dermesropian*  
Rudy A. Dermesropian

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